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REMARKS

Reconsideration of the present application is respectfully requested in view of the following remarks. Prior to entry of this response, Claims 1-3, 6-8, 10-14, 16-19, 21, and 24-27 were pending in the application, of which Claims 1, 10, 19, and 27 are independent. In the Office Action dated February 6, 2007, Claims 1-3, 6-8, 10-14, 16-19, 21, and 24-27 were rejected under 35 U.S.C. § 103(a). Following this response, Claims 1-3, 6-8, 10-14, 16-19, 21, and 24-27 remain in this application. Applicants hereby address the Examiner's rejections in turn.

I. <u>Interview Summary</u>

Applicants thank Examiner Rutledge for the courtesy of a telephone interview on July 27, requested by the undersigned to discuss the rejection of the current claims under 35 U.S.C. § 103 and the alleged non-compliant Information Disclosure Statements (IDS). During the interview, Applicants asserted the IDS are compliant and that the cited references do not render obvious the claims as currently amended. No agreement was reached regarding patentability or compliancy of the IDS.

II. Rejection of the Claims Under 35 U.S.C. § 103(a)

In the Office Action dated February 6, 2007, the Examiner rejected Claims 1-3, 6-8, 10-14, 16-19, 21, and 24-27 under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 5,974,413 ("Beauregard") in view of U.S. Patent No. 6,553,385 ("Johnson"). Claims 1, 10, 19, and 27 have been amended, and Applicants respectfully submit that the amendments overcome this rejection and add no new matter.

Amended Claim 1 is patentably distinguishable over the cited art for at least the reason that it recites, for example, "wherein receiving the string of text comprises maintaining a job queue, the job queue storing the string of text before transmitting the string of text to a plurality of recognizer plug-ins; determining if the string of text has been edited; when the string of text has been edited, deleting the edit string of text from the queue; when the string of text has not been edited, transmitting the string of text, from the job queue, to the plurality of recognizer plug-ins during an idle time." Amended Claims 10, 19, and 27 each includes a similar recitation. Support for these amendments can be found in the specification at least on page 13, lines 14-35.

In contrast, *Beauregard* at least does not teach or suggest the aforementioned recitation from Claim 1. For example, *Beauregard* merely discloses selecting action words from text that arrives on a user's screen. (See col. 36, lines 63-64.) These words may arrive via documents, E-mail, over the Internet, or from other sources. (See col. 36, lines 64-66.) *Beauregard's* words are either input by a user or someone else at some earlier time. (See col. 36, lines 66-67.) These words can be used as action words so long as they can be selected by the user via highlighting. (See col. 37, lines 1-2.) In *Beauregard*, the user, after selecting a word, clicks an icon located on a monitoring bar that initiates a wordbase search to determine whether the word is an action word. (See col. 37, lines 2-7.) Consequently, *Beauregard* merely discloses selecting words and icons used to initiate a search to determine if the word is an action word. As a result, *Beauregard* does not disclose a job queue maintaining the string of text, determining if the string of text has been edited, and deleting and edit string of text

from the queue. Rather *Beauregard* merely discloses searching to determine if a word is an action word.

In addition, *Beauregard* merely discloses using a LightEditor to allow a user to create and add action words and service scripts to a wordbase. (See col. 29, lines 56-57.) The LightEditor contains several fields for user input and buttons for actions related with the fields' content that comprise a wordbase item record. (See col. 29, lines 62-64.) The fields can be activated or de-activated through check boxes that tell the system to monitor the text stream for the word in the field and to perform the service script when that word is encountered. (See col. 29, line 67-col. 30, line 1.)

Consequently, *Beauregard* merely discloses creating and adding words to a wordbase that can be activated or deactivated through check boxes. As a result, *Beauregard* does not disclose a job queue maintaining the string of text, determining if the string of text has been edited, and deleting and edit string of text from the queue. Rather *Beauregard* merely discloses using an editor to create and add action words to a wordbase.

Furthermore, *Johnson* does not overcome *Beauregard's* deficiencies. *Johnson* merely discloses requests for information extraction being passed to extractors. (*See* col. 2, lines 13-14.) In *Johnson*, a framework can handle application data pre and post processing, extractor control, and enrich the information extracted by the extractors. (*See* col. 2, lines 14-17.) The framework can also suggest necessary actions the application should take on the data. (*See* col. 2, lines 17-18.) The framework architecture in *Johnson* allows the framework to be extended by providing new libraries exporting certain simple functions. (*See* col. 2, lines 25-27.) Consequently, *Johnson*

merely discloses extracting and passing information to extractors to suggest necessary actions to take on the data. As a result, *Johnson* does not disclose a job queue maintaining the string of text, determining if the string of text has been edited, and deleting and edit string of text from the queue. Rather *Johnson* merely discloses extracting and passing data.

Combining *Beauregard* with *Johnson* would not have led to the claimed invention because *Beauregard* and *Johnson*, either individually or in combination, at least do not disclose or suggest "wherein receiving the string of text comprises maintaining a job queue, the job queue storing the string of text before transmitting the string of text to a plurality of recognizer plug-ins; determining if the string of text has been edited; when the string of text has been edited, deleting the edit string of text from the queue; when the string of text has not been edited, transmitting the string of text, from the job queue, to the plurality of recognizer plug-ins during an idle time," as recited by amended Claim 1. Independent Claims 10, 19, and 27 each includes a similar recitation. Accordingly, independent Claims 1, 10, 19, and 27 each patentably distinguishes the present invention over the cited art, and Applicants respectfully request withdrawal of this rejection of Claims 1, 10, 19, and 27.

Dependent Claims 2-3, 6-8, 11-14, 16-18, 21, and 24-26 are also allowable at least for the reasons described above regarding independent Claims 1, 10, and 19, and by virtue of their dependency upon independent Claims 1, 10, and 19. Accordingly, Applicants respectfully request withdrawal of this rejection of dependent Claims 2-3, 6-8, 11-14, 16-18, 21, and 24-26.

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III. Conclusion

In view of the foregoing remarks, Applicant respectfully requests the reconsideration and reexamination of this application and the timely allowance of the pending claims. The preceding arguments are based only on the arguments in the Office Action, and therefore do not address patentable aspects of the invention that were not addressed by the Examiner in the Office Action. The claims may include other elements that are not shown, taught, or suggested by the cited art. Accordingly, the preceding argument in favor of patentability is advanced without prejudice to other bases of patentability. Furthermore, the Office Action contains a number of statements reflecting characterizations of the related art and the claims. Regardless of whether any such statement is identified herein, Applicant declines to automatically subscribe to any statement or characterization in the Office Action.

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Please grant any extensions of time required to enter this response and charge any additional required fees to our deposit account 13-2725.

> Respectfully submitted, **MERCHANT & GOULD P.C.**

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